

HUSCH BLACKWELL

Crystal M. Bloom
Partner

One Congress Street, Suite 3102
Boston, MA 02114
Direct: 617.598.6783
Fax: 617.598.6790
crystal.bloom@huschblackwell.com

September 12, 2025

Via Email

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Massachusetts Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: Holy Family Hospital – Haverhill Campus Essential Services Finding

Dear Mr. Davis:

We write on behalf of Holy Family Hospital (“Hospital”) in response to the Department of Public Health’s (the “Department”) follow up questions about the Hospital’s plan to preserve access to care following the closure of certain services at the Hospital’s Haverhill campus.

Below are the Hospital’s responses to your questions following the Hospital’s submission of its access plan.

1. Availability of Emergency Department Services.

The Department has requested additional information on the transition of the Emergency Department (ED) to a Satellite Emergency Facility (SEF). The Department specifically asked for information related to the timing of the closure of the ED, the opening of the SEF, and steps being taken to minimize the disruption of services during the transition, as well as the Hospital’s long-term commitment to operating the SEF at the Haverhill location. In addition, the Department asked for more details regarding the consideration of transport times to Lawrence General Hospital and the Methuen campus EDs, potential increases in time out of service for ambulances during return trips and plans to address medical control for ambulance services currently receiving that from the Hospital.

The Hospital remains committed to its patient population in Haverhill and the surrounding area and is focused on continuing to provide the care needed, including emergency services through the SEF. It is important to note that because the hospital will continue to provide services with the same staff at the same location, the transition of the ED to a SEF is expected to occur seamlessly. The Hospital plans to close the ED and reopen immediately as a SEF, which will minimize disruption to services during the transition.

The Hospital has given a great deal of consideration to the transport times to Lawrence General Hospital and the Hospital’s Methuen campus, and how this will change with the transition of the ED to a SEF. Given the location of the Haverhill campus, in the eastern corner of the city, the proximity of the Methuen campus and LGH, and the existing ambulance services in the community, modifying the point of entry to include Methuen and Lawrence will have minimal impact on unit availability.

HUSCH BLACKWELL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Massachusetts Department of Public Health
September 12, 2025
Page 2

In Calendar Year 2024, the Holy Family Hospital Haverhill Emergency Department received 5,548 patients via ambulance, the overwhelming majority were transported by Pridestar/Trinity EMS, the City of Haverhill 911 EMS provider. From January 1, 2025, through June 30, 2025, the ED has received 3,077 patients via ambulance, with 2,736 patients (89%) being transported by Pridestar/Trinity and the remaining 341 patients (11%) were transported by other EMS agencies. The average daily ambulance volume is 17 patients per 24 hours, 15 of which are transported by Pridestar/Trinity. Approximately two (2) patients arrive per day by other EMS services and as a result, this low transport volume will have an extremely limited impact on area EMS providers.

The following is a summary of the available EMS services and the travel time to area facilities. These travel times indicate that the additional time out of service will be minimal.

Haverhill: Pridestar/Trinity EMS

North Haverhill impact: Upper Main Street, Route 125 NH Border Area

Distance from Main Street at the NH border to Holy Family Haverhill: 5 miles

Distance from Main Street at the NH border to Holy Family Methuen: 8 miles

Travel time to Holy Family Haverhill: 14 minutes

Travel time to Holy Family Methuen: 13 minutes (predominantly highway travel)

Downtown/Mount Washington Area (High Density)

Distance from 2 Washington Square to Holy Family Haverhill: 2.4 miles

Distance from 2 Washington Square to Holy Family Methuen: 7.6 miles

Distance from 2 Washington Square to Lawrence General Hospital: 8.2 miles

Travel time to Holy Family Haverhill: 6 minutes

Travel time to Holy Family Methuen: 16 minutes (predominantly highway travel)

Travel time to Lawrence General Hospital: 13 minutes (predominantly highway travel)

For EMS agencies traveling from southern NH that are transporting to Holy Family Hospital Haverhill, the impact is negligible as the main thoroughfare is Route 125 into Massachusetts at the Plaistow/Haverhill State Line:

Distance from Main Street at the NH border to Holy Family Haverhill: 5 miles

Distance from Main Street at the NH border to Holy Family Methuen: 8 miles

Travel time to Holy Family Haverhill: 14 minutes

Travel time to Holy Family Methuen: 13 minutes (predominantly highway travel)

Boxford: (Town Center at 7 Elm Street)

EMS provided by Boxford and West Boxford Fire Departments, Cataldo Ambulance and Pridestar/Trinity EMS

Distance from 7 Elm Street Holy Family Haverhill: 9.2 miles

Distance from 7 Elm Street to Holy Family Methuen: 11.8 miles

Distance from 7 Elm Street to Lawrence General Hospital: 10.3 miles

Distance from 7 Elm Street to Anna Jaques Hospital :15 miles

Travel time to Holy Family Haverhill: 19 minutes

Travel time to Holy Family Methuen: 26 minutes

HUSCH BLACKWELL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Massachusetts Department of Public Health
September 12, 2025
Page 3

Travel time to Lawrence General Hospital: 20 minutes
Travel time to Anna Jaques: 16 minutes

Georgetown: (Center of town)

EMS provided by Georgetown Fire Department, two BLS ambulances in service with ALS and backup services provided by Cataldo Ambulance and Newbury Fire.

Distance from 10 E Main Street Holy Family Haverhill: 4.6 miles
Distance from 10 E. Main Street to Holy Family Methuen: 11.3 miles
Distance from 10 E. Main Street to Anna Jaques Hospital, Newburyport: 11.6
Travel time to Holy Family Haverhill: 10 minutes
Travel time to Holy Family Methuen: 24 minutes
Travel time to Anna Jaques Hospital: 16 minutes

Merrimac: (24 Merrimac Square)

EMS provided by Merrimac Fire Department

Distance from 24 Merrimac Square to Holy Family Haverhill: 6.1 miles
Distance from 24 Merrimac Square to Holy Family Methuen: 13.9 miles
Distance from 24 Merrimac Square to Anna Jaques Hospital: 7.7 miles
Distance from 24 Merrimac Square to Lawrence General Hospital: 14.2 miles
Travel time to Holy Family Haverhill: 13 minutes
Travel time to Holy Family Methuen: 17 minutes
Travel time to Anna Jaques Hospital: 15 minutes
Travel time to Lawrence General Hospital: 15 minutes

North Andover: (1600 Osgood near Haverhill border)

Distance from 1600 Osgood Street to Holy Family Haverhill: 6.2 miles
Distance from 10 E. Main Street to Holy Family Methuen: 5.6 miles
Distance from 10 E. Main Street to Lawrence General Hospital: 4.1
Travel time to Holy Family Haverhill: 15 minutes
Travel time to Holy Family Methuen: 16 minutes
Travel time to Lawrence General Hospital: 9 minutes

In addition, as previously discussed, Merrimack Valley Transit (MeVa), in addition to its existing services, will be actively partnering with the health system to refine bus services in the areas and facilitate transportation between the sites, further minimizing any disruptions to transportation in the area due to the changes at the Haverhill campus.

The Department also asked about plans to address medical control for ambulance services currently receiving that from the Hospital. Pridestar/Trinity, which transports the majority of patients, receives medical control from Holy Family Hospital – Methuen. To address the infrequent medical control currently provided at the Haverhill campus, the Hospital plans to send communication to all Region 3 and Southern New Hampshire EMS agencies to ensure they are aware that all medical control consultations must switch to Holy Family Hospital – Methuen. As referenced in our previous correspondence, the Hospital has

HUSCH BLACKWELL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Massachusetts Department of Public Health
September 12, 2025
Page 4

engaged in a great deal of public outreach to ensure all relevant agencies are aware of this transition, and this outreach will continue during the transition.

2. Information on the protocols used to transport patients to other facilities.

The Department requested additional detail on the protocols used to transport patients to the Methuen campus or another facility after the transition from an ED to a SEF. All ground ambulance transfers from the Haverhill SEF to the Methuen campus or to Lawrence General Hospital will be completed by the health system's ambulance service and therefore this will not impact the service times of the region's other ambulance services.

The Hospital intends to use the same protocols it currently uses for such transfers. The clinical care provided by EMS is governed by the Statewide Treatment Protocols.

Patients that require ambulance transfer from the Haverhill SEF are considered a priority transport.

- Requests for ground ambulance transportation from the SEF will be centralized and processed by the Lawrence General Hospital Ambulance Service Communications Center (LGHCC) which is staffed with two certified Emergency Medical Dispatchers 24/7.
- The SEF will classify the patient's acuity as either Immediate, Standard, or Scheduled.
- SEF staff will contact the LGHCC and provide the patient information, level of transport required, and other pertinent information.
- LGHCC will determine the most appropriate ambulance resource and book the transport.
- The need for critical care transports will be determined by the SEF provider and SEF staff will contact Boston Medflight directly when needed.
- The Ambulance response time parameters are:
 - Immediate: The ambulance will be at the patient's bedside within 15 minutes 90% of the time.
 - Standard: The ambulance will be at the patient's bedside within 45 minutes 90% of the time.
 - Scheduled: The ambulance will be at the patient's bedside within 45 minutes 90% of the time.

Sincerely,



Crystal Bloom

cc: T. Smith, DPH
W. Mackie, DPH
J. Gagne, DPH
J. Bernice, DPH
S. Carlson, DPH
K. Fillo, DPH